

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

WELLPATH HOLDINGS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-90533 (ARP)

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Akin Gump Strauss Hauer & Feld LLP (“Akin”) hereby appears in the above-captioned cases as counsel to an ad hoc group of certain unaffiliated holders of, or investment advisors, sub-advisors, or managers of discretionary accounts that hold Prepetition First Lien Loans and Prepetition Second Lien Term Loans² (the “Ad Hoc Lender Group”). Akin enters its appearance pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and respectfully requests pursuant to Bankruptcy Rules 2002(i) and 9007, that copies of all notices given or required to be given, and all papers served or required to be served in the above-captioned cases, be given to and served upon the following:

¹ A complete list of the Debtors (as defined below) in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/Wellpath>. The Debtors’ service address for these chapter 11 cases is 3340 Perimeter Hill Drive, Nashville, Tennessee 37211.

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to them in the *Declaration of Timothy J. Dragelin as Chief Restructuring Officer and Chief Financial Officer of Wellpath Holdings, Inc. and Certain of Its Affiliates and Subsidiaries in Support of the Debtors’ Chapter 11 Proceedings and First Day Pleadings* [Docket No. 20].

AKIN GUMP STRAUSS HAUER & FELD LLP

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PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code section 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, notices of any application, complaint, demand, hearing, motion, petition, order, pleading or other request, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, hand delivery, telephone, electronic mail or otherwise, that is filed or given in connection with the above-captioned cases.

PLEASE TAKE FURTHER NOTICE that this request shall not be deemed or construed to be a waiver of any substantive or procedural rights of the Ad Hoc Lender Group, including, without limitation: (i) to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the Southern District of Texas (the “District Court”); (ii) to have a trial by jury in any proceeding so triable in these chapter 11 cases or any case, controversy, or proceeding related to these chapter 11 cases; (iii) to have the District Court

withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) as a waiver of any other rights, claims, actions, defenses, setoffs or recoupments to which the Ad Hoc Lender Group may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: November 12, 2024

Respectfully Submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Marty Brimmage Jr.

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Counsel to the Ad Hoc Lender Group

CERTIFICATE OF SERVICE

I certify that on November 12, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Marty Brimmage Jr.